

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
THE UNOFFICIAL ON-SHORE	:
CREDITORS' COMMITTEE OF THE	:
BAYOU FAMILY OF COMPANIES,	:
	:
Plaintiff,	:
	:
v.	:
	:
BAYOU GROUP, LLC, <i>et al</i> ,	:
	:
Defendants.	:
-----X	

No.: 7:06-cv-02379-UA

**NOTICE OF MOTION OF
PLAINTIFF FOR THE
APPOINTMENT OF A RECEIVER**

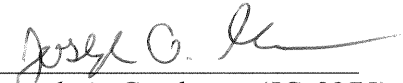
PLEASE TAKE NOTICE that upon the accompanying Declaration of Joseph A. Gershman, the Declaration of Jonathan J. Fisher, the memorandum of Plaintiff The Unofficial On-Shore Creditors' Committee of the Bayou Family of Companies in support of the motion, and all prior pleadings and proceedings in this action, Plaintiff, by its undersigned counsel, Kasowitz Benson Torres & Friedman LLP, will move this Court, at a time and place to be set by the Court at the United States Courthouse, Southern District of New York, 300 Quarropas Street, White Plains, New York, pursuant to Rule 66 of the Federal Rules of Civil Procedure, for an order appointing a receiver and granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, unless otherwise ordered by the Court, opposition papers, if any, are required to be served upon the undersigned attorneys for Plaintiff within 14 days of service of this Notice, and reply papers, if any, shall be served within five days thereafter.

Oral argument is requested if any opposition is filed.

Dated: New York, New York
March 28, 2006

KASOWITZ, BENSON, TORRES &
FRIEDMAN LLP

By: 
Joseph A. Gershman (JG-8275)
Joshua S. Bauchner (JB-9106)
1633 Broadway
New York, New York 10019
(212) 506-1700

Attorneys for Plaintiff

PRESTON GATES ELLIS
& ROUVELAS MEEDS LLP
Richard A. Kirby
Philip M. Guess
Scott Lindsay
Joshua C. Gaul
1735 New York Avenue, N.W., Suite 500
Washington, D.C. 20006-5209
Tel: (202) 661-3730
Fax: (202) 331-1024

Counsel for Plaintiff